

September 10, 2018

VIA ECFS

Wireless Telecommunications Bureau  
Office of Engineering Technology  
Federal Communications Commission  
441 12<sup>th</sup> Street, SW  
Washington, DC 20006

Re: Sony Corporation Spectrum Access System  
Initial Commercial Deployment Proposal  
GN Docket 15-319

To whom it may concern:

Sony Corporation (“Sony”) submits the following proposal for Initial Commercial Deployment (ICD) of its Spectrum Access System (SAS), as specified in the recent Public Notice from the Wireless Telecommunications Bureau and Office of Engineering Technology in the above-referenced proceeding.<sup>1</sup>

Pursuant to Section 0.459 of the Commission’s rules, Sony requests confidential treatment for portions of its ICD proposal. This submission includes commercial information and trade secrets regarding the implementation details of Sony’s proposal, and public disclosure would undermine Sony’s ability to offer a competitive SAS. This information has not previously been shared outside of Sony, including to the public or to third parties. Sony asks that these responses remain confidential until the Sony ICD proposal has been approved and implemented, at which point any potential for competitive harm will no longer exist. Sony asks that the Commission return this submission if this request for confidentiality is denied. Sony consents to the sharing of its complete response with other Federal government agencies.

Please contact the undersigned with any questions about this submission or confidentiality request.

Respectfully submitted,

/s/ \_\_\_\_\_  
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Director and Counsel  
Sony Electronics Inc.  
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<sup>1</sup> *Wireless Telecommunications Bureau and Office of Engineering and Technology Establish Procedure and Deadline for Filing Spectrum Access System Initial Commercial Deployment Proposals*, Public Notice, DA 18-783 (July 27, 2018) (“ICD Public Notice”).